

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 20-cr-20090-MSN

SHANE SONDERMAN,

Defendant.

**DEFENDANT’S POSITION PAPER ON
SUPERVISED RELEASE VIOLATION PETITION**

The Defendant, Shane Sonderman, by and through his counsel, Greg Gookin, hereby submits his position paper with respect to the supervised release violation petition. (ECF No. 76)

The parties are due to appear before the Court on June 12, 2025, at 9:30 a.m. for final disposition of this matter. Defense counsel estimates that the hearing should not take longer than thirty minutes.

Mr. Sonderman admits guilt as to violations 1, 2, and 3 (failure to maintain lawful employment; failure to notify probation officer of contact with law enforcement; and failure to follow rules of cybercrime management program).

Mr. Sonderman stipulates that the United States could prove, by a preponderance of the evidence, that he committed violation 4. (Unauthorized possession or use of a computer with access any “on-line computer service.”)

Mr. Sonderman takes full responsibility for his actions and choices and makes no excuses for his conduct. Mr. Sonderman’s suggested guideline range of punishment is **3-9 months**, with a statutory maximum of 24 months. At Mr. Sonderman’s request, undersigned counsel is attaching

to this filing copies of numerous certificates that Mr. Sonderman received while in BOP custody during his original sentence.

The defense, the United States, and the probation office will jointly recommend **6 months** of imprisonment. This within-guidelines sentence reflects the parties' recognition that Mr. Sonderman waived his probable cause and detention hearings and indicated a quick willingness to accept responsibility for his actions. After his imprisonment, Mr. Sonderman will return to supervised release until his scheduled expiration of August 19, 2027. Mr. Sonderman may seek to address the Court at his hearing and reserves the right to change his position should different circumstances arise.

Respectfully submitted,

DORIS RANDLE-HOLT
FEDERAL DEFENDER

s/ Greg Gookin

Greg Gookin, TN BPR #023649

Assistant Federal Defender

200 Jefferson Avenue, Suite 200

Memphis, TN 38103

(901) 544-3895

gregory_gookin@fd.org

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing filing has been forwarded via the Court's electronic filing system to Ms. Lauren Delery, Assistant United States Attorney, 167 N. Main, Suite 800, Memphis, TN 38103.

This 5th day of June, 2025.

s/ Greg Gookin

Greg Gookin

Assistant Federal Defender